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2016 Submission

Date: September 30, 2016

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th St, SW
Washington, DC 20554

USAC
Vice President, High Cost and Low Income Division
2000 L Street, NW, Suite 200
Washington, DC 20036

RE: CC Docket No. 96-45/WC Docket No. 14-58, Annual Self-Certification of Support for
Eligible Telecommunications Carriers pursuant to 47 C.F.R. §54.314

Ladies and Gentlemen,

Eligible Telecommunications Carriers Pursuant to 47 C.F.R. § 54.314

On May 6, 2016, Virginia PCS Alliance, L.C. and Richmond 20 MHZ, LLC and their affiliates (collectively, "NTELOS") were acquired by Shenandoah Telecommunications Company ("Shentel") pursuant to the Agreement and Plan of Merger dated as of August 10, 2015 by and among Shentel, Gridiron Merger Sub, Inc., and NTELOS Holdings Corp. The merger was approved by the Federal Communications Commission (the "Commission") in its Memorandum Opinion and Order dated April 15, 2016.¹ Thus, Virginia PCS Alliance, L.C. and Richmond 20 MHZ, LLC, are now subsidiaries of Shentel.

Pursuant to the requirements of 47 C.F.R. § 54.314, Shentel on behalf of its affiliates Virginia PCS Alliance, L.C. and Richmond 20 MHZ, LLC, hereby certifies to the Federal Communications Commission and the Universal Service Administrative Company that they are eligible to receive federal high-cost support for the program years cited as more fully described below.

I, Raymond B. Ostroski, to the best of my knowledge based on the information provided to me by principles of NTELOS in connection with the merger, attest that for the Study Area Code listed below all federal high-cost support provided to NTELOS was used in the preceding calendar year (2015) and will

¹ In the Matter of SprintCom, Inc., Shenandoah Personal Communications, LLC, and NTELOS Holdings Corp. For Consent to Assign Licenses and Spectrum Lease Authorizations and to Transfer Control of Spectrum Lease Authorizations and an International Section 214 Authorization, Memorandum Opinion and Order, 31 FCC Rcd. 3631 (2016).

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be used in the coming calendar year (2017) only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.² Prior to the closing of the merger, NTELOS petitioned the Commission to modify the area covered by SAC 199008 due to a transaction in which NTELOS sold the spectrum licenses to provide service to customers in certain areas of eastern Virginia, including portions of NTELOS's designated Eligible Telecommunications Carrier service area.³ That petition remains pending before the Commission.

As a result, in 2016, this certification to use the support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, will apply to the retained portion of the service territory, served by Shentel.⁴

Company Name(s)	SAC
Richmond 20 MHZ LLC and Virginia PCS Alliance, L.C.	199008

Signed,



Raymond B. Ostroski
Vice President, Legal and General Counsel
(540)984-5040

² C.F.R. §54.314(b) ("Carriers not subject to State jurisdiction. An eligible telecommunications carrier not subject to the jurisdiction of a State that desires to receive support pursuant to the high-cost program must file an annual certification with the Administrator and the Commission stating that all federal high-cost support provided to such carrier was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. Support provided pursuant to the high-cost program shall only be provided to the extent that the carrier has filed the requisite certification pursuant to this section.").

³ Virginia PCS Alliance, L.C. and Richmond 20 MHz, LLC Petition for Modification of Eligible Telecommunications Carrier Service Area, Petition for Modification of Eligible Telecommunications Carrier Service Area, WC Docket Nos. 09-197, 10-90 (filed October 1, 2015).

⁴ See *id.* (identifying the retained portion of the ETC service territory).